

REMARKS

Claims 1, 4, 6-11, 14-20, 22, 24-31, 34-41 and 43-49 are pending in the application.

Claims 1, 4, 6-11, 14-19, 30, 31, and 34-49 stand rejected.

Claims 1, 10, 20, 30, and 40 have been amended. Support for these amendments can be found, at least, at ¶ [0056] and FIG. 7 of the Specification.

Formal Matters

Appreciation is expressed for the telephonic interview conducted on October 21, 2010 between Examiner Poltorak and Shawn Doman. During the interview, the Hama reference was discussed with reference to independent claim 10. The undersigned believes this paper is in harmony with the positions expressed during the interview.

Rejection of Claims under 35 U.S.C. § 112

Claims 40-41 and 43-49 stand rejected under 35 U.S.C. § 112, second paragraph, as purportedly failing to set forth the subject matter which Applicants regard as their invention. Applicants note that claim 43 was previously cancelled, and so submit that this rejection is moot as to claim 43.

As to the remaining claims, Applicants traverse this rejection. Applicants respectfully submit that the specification discloses specific means correlated to the claimed functions. For example, ¶ [0029] discloses “each TSG device is able to assign an SGI,” (claimed means for assigning an SGI). By way of further example, ¶ [0031] discloses the TSG device classifying a packet (claimed means for classifying said packet). By way of further example, ¶ [0040] discloses an ingress router determining a tunnel through which the packet is to be sent (claimed means for determining a routing). By way of further example, ¶ [0041] discloses an egress router determining whether forwarding a packet is permissible and, if so, forwarding the packet (claimed means for forwarding said packet).

For at least the foregoing reasons, Applicants respectfully request the Examiner’s reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

Rejection of Claims under 35 U.S.C. § 102

Claims 1, 4, 6-11, 14-20, 22, 24-31, 34-41 and 43-49 stand rejected under 35 U.S.C. § 102(e) as being unpatentable over U.S. Patent Publication No. 2004/0202171 naming Hama as inventors (“Hama”). Applicants traverse this rejection

Applicants respectfully submit that the cited portions of Hama fail to disclose all elements of Applicants’ claims. However, in order to expedite prosecution, Applicants have amended the claims. For example, claim 10 now recites, in relevant part, identifying a tunnel identifier. Support for this amendment is found, at least, at ¶ [0056] and FIG. 7 of the Specification. Applicants respectfully submit that such features are not disclosed by Hama.

Claim 10 recites both a tunnel identifier and a security group identifier (SGI). Thus, claim 10 recites two identifiers. By contrast, the cited portions of Hama disclose only a single identifier. The Office Action attempts to equate Hama’s VLAN ID with the claimed SGI. Office Action, p. 4. Even if the two were comparable, a point Applicants do not concede, Hama would still fail to disclose two identifiers, particularly two identifiers that might somehow be successfully equated with the claimed SGI and tunnel identifier.

Further, claim 10 recites that the tunnel identifier of the tunnel is identified based on a routing for the packet, and that the routing is determined based, at least in part, on the SGI. Thus, the identification of the tunnel identifier depends on the SGI. The two identifiers recited in claim 10 are related in that determining the value of one depends on the value of the other. As the cited portions of Hama fail to disclose two identifiers, as claimed, it follows that the cited portions of Hama must also fail to disclose a relationship that is in any way comparable to the claimed relationship between the two identifiers.

The claimed method of using security groups and tunnels not only provides increased security capabilities by controlling access to tunnels, but also improves efficiency of access control by conforming to existing protocols. Applicants respectfully submit that these improvements are neither contemplated nor recognized by the teachings of Hama. This is unsurprising since Hama is directed transferring VLAN packets on an MPLS core network. Hama, Abstract. As this is an endeavor completely unrelated to controlling access to tunnels, one would not expect Hama to disclose the claimed features.

For at least the foregoing reasons, Applicants respectfully request the Examiner's reconsideration and withdrawal of the rejections to claims 10 and 1, 20, 30, and 40 (which contain substantially similar features) as well as all claims that depend therefrom, and an indication of the allowability of same.

CONCLUSION

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5092.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. Applicant also hereby authorizes that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

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